

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
\_\_\_\_\_ DIVISION

RECEIVED

MAR 13 2023

RICHARD W. NAGEL  
Clerk Of Court  
CINCINNATI, OHIO

Tracy D Halsell

(Enter Above the Name of the Plaintiff in this Action)

VS.

Jada Pinkett Smith

(Enter above the name of the Defendant in this Action)

If there are additional Defendants, please list them:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

1:23CV137

J. BARRETT

M.J. LITKOVITZ

COMPLAINT

I. Parties to the action:

Plaintiff: Place your name and address on the lines below. The address you give must be the address where the court may contact you and mail documents to you. A telephone number is required.

Tracy D Halsell

Name - Full Name Please - PRINT

2508 Kemper lane # 417

Street Address

Cincinnati, Ohio 45216

City, State and Zip Code

513-501-3959

Telephone Number

If there are additional Plaintiffs in this suit, a separate piece of paper should be attached immediately behind this page with their full names, addresses and telephone numbers. If there are no other Plaintiffs, continue with this form.

Defendant(s):

Place the name and address of each Defendant you listed in the caption on the first page of this Complaint. This form is invalid unless each Defendant appears with full address for proper service.

1. Tada Pinkett Smith  
Name - Full Name Please  
10250 Constellation Blvd. 9th Fl LA Angeles, Ca 90067  
Address: Street, City, State and Zip Code
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_

If there are additional Defendants, please list their names and addresses on a separate sheet of paper.

II. Subject Matter Jurisdiction

Check the box or boxes that describes your lawsuit:

- ☐ Title 28 U.S.C. § 1343(3)  
[A civil rights lawsuit alleging that Defendant(s) acting under color of State law, deprived you of a right secured by federal law or the Constitution.]
- ☒ Title 28 U.S.C. § 1331  
[A lawsuit "arising under the Constitution, laws, or treaties of the United States."]
- ☒ Title 28 U.S.C. § 1332(a)(1)  
[A lawsuit between citizens of different states where the matter in controversy exceeds \$75,000.]
- ☒ Title 21 United States Code, Section 2151.031  
[Other federal status giving the court subject matter jurisdiction.]

## III. Statement of Claim

Please write as briefly as possible the facts of your case. Describe how each Defendant is involved. Include the name of all persons involved, give dates and places.

Number each claim separately. Use as much space as you need. You are not limited to the papers we give you. Attach extra sheets that deal with your statement claim immediately behind this piece of paper.

In and around about the year 1990 Mrs. Jada Pinkett Smith did knowingly in fact continually submerge "me" the plaintiff in cold water in the bathtub at her apartment in Louisville, Ky California Square Two Apartments 1681 Garland Ave Louisville, Ky 40210 I was often molested in this home as well as my sister. I was choked up against the wall then mistreated on the account and in violation of my 14<sup>th</sup> Amendment right equal protection by her husband Tarras Turney Truitt which has been reported to Louisville Department of Family Services however this lawsuit is being filed which eventually also will be submitted to the courts a notice from the hospital in 1999 indicating that I do suffer from Post Traumatic Stress Disorder its a awful memory that never goes away that Mrs. Smith continually what seems to be conspiracy to commit murder as she submerged me in cold bath water at 18 months old not even two years old yet, she also discriminated against me for being gay, & african american torturing me and my mother Kimberly Jordan with her vicious, cruel, violent assault to the "me" a minor child (1991)

## IV. Previous lawsuits:

If you have been a Plaintiff in a lawsuit, for each lawsuit state the case number and caption.  
(Example, Case Number: 2:08-cv-728 and Caption: John Smith vs. Jane Doe).

Case Number

Caption

<u>22CV24541</u>	<u>Jordan - Halsell</u>	vs. <u>Progressive Direct Insurance</u>
<u>22:3922</u>	<u>Jordan - Halsell</u>	vs. <u>People Ready - Beyonce &amp; Jay Z</u>
_____	_____	vs. _____

## V. Relief

In this section please state (write) briefly exactly what you want the court to do for you. Make no legal argument, cite no case or statutes.

I want this court to litigate the incident gather the facts and create a legal idea of discipline with regard to the information obtained from the course of the civil action and findings herein and order Mrs. Tada Dunkett Smith to pay me the victim in the incident \$25,000,000.00 for child abuse, child neglect, mental anguish, mental distress, suffering from Post Traumatic Stress Disorder and the estrangement from my big sisters Stacy & Michelle.

I state under penalty of perjury that the foregoing is true and correct. Executed on

this 13<sup>th</sup> day of March, 2023.

J. Halsell  
Signature of Plaintiff